

¹ Since the time of filing the Motion, the parties in the underlying litigation sought and obtained an amendment to the Court's case management order, requiring expert reports to be filed February 15, just twelve business days after the Zoo's requested deadline for its reply.

which had acknowledged PETA's need to resolve this matter promptly [*Id.* ¶ 10]—requested an extension of time until January 10 to respond to the Motion [ECF No. 11], which the Court granted [ECF No. 12]. As a result of that extension, PETA's reply in support of its motion was due, and filed, on January 17. [ECF No. 19.] As a result of that extension, Martin Luther King Jr. Day fell within the Zoo's time to reply in support of its incorporated motion to quash and for a protective order. The Zoo now requests yet *another* extension, alleging that it is "necessitate[d]" by a one-day federal holiday falling three days before a deadline of its own making (along with a "shortage of paralegal support").

This falls far short of the required good cause to further delay completing the briefing on this timely Motion. *See* Local Rule 6-1.05. Accordingly, this Court should deny the Zoo's motion for a second extension in this matter.

Dated: January 24, 2019

Respectfully submitted,

/s/ Jared S. Goodman

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Certificate of Service

I certify that on January 24, 2019, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, by which notification of such filing was electronically sent and served to all counsel of record.

/s/ Jared S. Goodman